IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI

VERNON BATES,)
Plaintiff,)
v.)
AMAZON LOGISTICS, INC. d/b/a) Case No.: 4:20-cv-00114
Amazon Prime,) JURY TRIAL DEMANDED
and) JUNY I RIAL DEMIANDED
BANANA LOGISTICS, LLC,)
and)
ABDURAZAQ A. JAMA,)
Defendants.))

AMAZON LOGISTICS, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING

Defendants, Amazon Logistics, Inc. d/b/a Amazon Prime ("Defendant" or "Amazon"), by and through undersigned counsel of record, Daniel E. Tranen of Wilson Elser Moskowitz Edelman & Dicker LLP, pursuant to Federal Rule of Civil Procedure 6(b), and for its Unopposed Motion and Notice of Initial Extension of Time to File Responsive Pleading, states as follows:

- 1. Plaintiff filed his Complaint on February 19, 2020.
- 2. Defendant was served on February 25, 2020. Pursuant to Fed. R. Civ. P. 12(a)(1)(A), Defendant's responsive pleading is due March 17, 2020 and has not yet expired.
- 3. Counsel for Defendant requires additional time to conduct due diligence regarding Plaintiff's allegations, including the alleged relationships between the codefendants, and to prepare its responsive pleadings.

4. Counsel for Plaintiff has agreed to an extension of the deadline for the filing of

Defendant's responsive pleading for 14 days, up to and including March 31, 2020.

5. The responsive pleading deadline has not been previously extended.

6. The extension does not interfere with any case management plan, scheduled

hearings, or other case deadlines.

7. This motion is not being made for the purpose of delay, but for Defendant's counsel

to perform the necessary due diligence in order to answer or otherwise plead appropriately.

8. Plaintiff will not be prejudiced by this extension.

9. Plaintiff does not object to Defendant's motion and consents to same.

WHEREFORE, Defendant, Amazon Logistics, Inc. d/b/a Amazon Prime, respectfully

request that this Honorable Court grant Amazon an extension to file its responsive pleading to

Plaintiff's Complaint to March 31, 2020.

DATED: March 16, 2020

Respectfully submitted,

AMAZON LOGISTICS, INC. D/B/A AMAZON

PRIME

/s/ Daniel E. Tranen

Daniel E. Tranen, 30316-45

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